



DIVISION OF
ENFORCEMENT

UNITED STATES
SECURITIES AND EXCHANGE COMMISSION
100 PEARL STREET, SUITE 20-100
NEW YORK, NY 10004-2616

March 11, 2025

Via ECF

The Honorable Sarah Netburn
United States Courthouse
40 Foley Square
New York, NY 10007

Re: SEC v. Thurlow, et al., No. 21 Civ. 7700 (VSB) (SN) (S.D.N.Y.)

Dear Judge Netburn:

Pursuant to the Court's March 10, 2025 order (Dkt. 143, the "Order") scheduling a settlement conference for May 21, 2025, and the Procedures for Cases Referred for Settlement to Magistrate Judge Sarah Netburn ("Settlement Procedures"), Plaintiff Securities and Exchange Commission ("SEC"), respectfully submits the SEC's proposed attendance plan for the settlement conference.

All members of the SEC's litigation team plan to attend the settlement conference in person: Trial Attorneys Abigail Rosen and Richard Primoff and staff attorneys Elizabeth Rosen and Kevin Hayne. All are knowledgeable about both the facts of this matter and the SEC settlement process and, therefore, intend to serve as knowledgeable representatives of the agency pursuant to the Settlement Procedures. In addition, the Associate Regional Director from the SEC's New York Regional Office who is supervising this matter will be available for consult by telephone during the conference. We note that, unlike many private litigants, no one person at the SEC has authority to enter into a settlement on the SEC's behalf. Accordingly, the SEC attendees will not have settlement authority during the settlement conference but will be authorized to offer settlement terms that the SEC staff is prepared to recommend to the Commissioners of the SEC.

The SEC respectfully requests that the Court approve our proposed attendance plan.

Respectfully submitted,

/s/ Abigail Rosen
Abigail Rosen

cc (via ECF): Roger Fidler, Esq. (*Pro Se*)
Joseph Siciliano, Esq. (Counsel to Defendants Thurlow and Oravec)

Nicolas Morgan, Esq. and John Zach, Esq. (counsel to Defendants Jordan and Western Bankers Capital)

cc (via email): Andrew Kramer, Esq. (counsel to Defendant Bryce Boucher)¹
Bradley Fidler (*Pro Se*)

¹ We understand that Andrew Kramer of Kramer LLC, who has not yet appeared, represents Defendant Bryce Boucher in this case.